

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**Texas Eastern Transmission LP**

Texas Eastern Transmission LP - St Francisville Compressor Station #617

St. Francisville West Feliciana Parish, Louisiana

**Agency Interest Number: 7345**

**Activity Number: PER20090001**

**Proposed Permit Number: 3160-00007-V2**

**I. APPLICANT**

**Facility:**

Texas Eastern Transmission LP

17238 Hwy 10 8 Mi E of

St. Francisville West Feliciana Parish, Louisiana

Latitude: 30° 50' 10.72"

Longitude: -92° 44' 51.43"

**Company:**

Texas Eastern Transmission LP - St Francisville Station #617

PO Box 1642

Houston, Texas 77251-1642

**II. FACILITY AND CURRENT PERMIT STATUS**

Texas Eastern Transmission, LP owns and operates the St. Francisville Compressor Station, a natural gas transmission plant, located on LA Hwy 10, about 10 miles northeast of St. Francisville, Louisiana, in West Feliciana Parish. St. Francisville Compressor Station began operation in 1957, and the initial air permit, Permit No. 3160-00007-01, was issued on January 4, 1984 with a modification Permit No. 3160-00007-V0, issued October 7, 1998. The facility currently operates under Permit No. 3160-00007-V1, issued June 18, 2004 and amended on October 12, 2005.

**III. PROPOSED PROJECT/PERMIT INFORMATION**

**Application**

A permit application was submitted on February 18, 2009 requesting a Part 70 operating permit renewal for the St. Francisville Compressor Station. Additional information was submitted on July 23, 2009 and July 30, 2009.

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**Project**

Texas Eastern Transmission LP is requesting a Permit Renewal for the St. Francisville Compressor Station. The St. Francisville Compressor Station employs four (4) natural gas turbine compressors to recompress and move natural gas through transmission pipelines. Line pressure must be maintained in order to ensure that natural gas moves at sufficient volumes for reliable service at all delivery points. Various support activities are performed at the St. Francisville Compressor Station to maintain proper operation of the turbines and ancillary equipment. Some of these support activities and ancillary equipment generate emissions, which are identified in this application.

Collected pipeline liquids (condensate) are stored until transported off-site by tank truck, resulting in emissions from the storage and loading. Tanks are also used to store lube oil, and wastewater. One (1) auxiliary engine is maintained on-site to generate emergency power in the event of a loss of grid electrical power. There are several sources of fugitive emissions from the facility, which consist of leaks from pipeline components and area fugitive emissions from truck loading activities. Discrete blowdown events also result in VOC emissions. These releases are emitted from several vents which have been identified collectively as miscellaneous process vents (MPV) and consist of turbine case vent, suction vent, and emergency shut-down operator discharge vent. Other emission sources from the operations at the St. Francisville Compressor Station are considered to be insignificant.

**Proposed Permit**

Permit 3160-00007-V2 will be the renewal of Part 70 operating permit 3160-00007-V1 for the St. Francisville Compressor Station.

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**Permitted Air Emissions**

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	8.55	8.55	-
SO <sub>2</sub>	4.40	4.40	-
NO <sub>x</sub>	979.00	979.00	-
CO	159.48	159.48	-
VOC	23.94	23.12	-0.82

**IV REGULATORY ANALYSIS**

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

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Applicability and Exemptions of Selected Subject Items

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
EQT0001 – E-1	NSPS Subpart GG – Standards of Performance for Stationary Turbines [40 CFR 60.330(b)] <b>NSPS Subpart KKK - Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants</b> [40 CFR 60.630(b)]	EXEMPT – No Construction or modification since 10/3/1977.
EQT0002 – E-2		EXEMPT – No Construction or modification since 1/20/1984
EQT0003 – E-3		EXEMPT – Trading Plan is established as an alternate means of compliance with emission requirements of Subsection D.
EQT0004 – E-4		DOES NOT APPLY – Does not meet the definition of affected fuel burning installations.
EQT0001 – E-1 EQT0002 – E-2 EQT0003 – E-3 EQT0004 – E-4 EQT0005 – E-5	Emission Standards for Nitrogen Oxides [LAC 33:III.2201.E.2]	EXEMPT – Emission source emits less than 250 tons per year.
	Emission Standards for Particulate Matter – Fuel Burning Equipment [LAC 33:III.1313.B]	Continuous emission monitoring not required for sources emitting less than 100 tons per year SO <sub>2</sub>
	Emission Standards for Sulfur Dioxide [LAC 33:III.Chapter 15]	EXEMPT – Identified toxic air pollutants result from the emission of natural gas, as a Group 1 virgin fossil fuel, and are thereby exempt.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.3]	

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<b>XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source</b>		
<b>ID No:</b>	<b>Requirement</b>	<b>Notes</b>
EQT0006 – T-1 EQT0007 – T-5 EQT0008 – T-9	NSPS Subpart K, Ka, Kb – Standards of Performance for Storage Vessels for Petroleum Products [40 CFR 60.110(a); 40 CFR 60.110b(a)]	DOES NOT APPLY – Tanks are <40,000 gal and < 40 cubic meters
	Storage of Volatile Organic Compounds [LAC 33:III.2103.G.1]	EXEMPT – Tank used to store condensate and is not subject to NSPS.
EQT0006 – T-1 EQT0007 – T-5 EQT0008 – T-9 EQT0010 - TLOAD	Comprehensive Toxic Air Pollution Emission Control Program [LAC 33:III.5105.B.3]	EXEMPT – Identified toxic air pollutants result in less than 10 tons of emissions, and are thereby exempt.
EQT0010 - TLOAD	Volatile Organic Compounds – Loading [LAC 33:III.2107.A.1.a]	Throughput does not exceed 20,000 or 40,000 gallons per day
UNF0001 – Entire Facility	Odor Regulations [LAC 33:III.2201.E.2]	EXEMPT – Odorant in natural gas used for safety purposes.
	Chemical Accident Prevention and Minimization of Consequences [LAC 33:III.Chapter 59]	DOES NOT APPLY – A Stationary Source subject to Part 68 does not include transportation subject to DOT oversight or regulation under. The St. Francisville station is regulated by DOT.

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**Prevention of Significant Deterioration/Nonattainment Review**

PSD and Nonattainment Review are not required.

**Streamlined Equipment Leak Monitoring Program**

This facility does not have a Streamlined Equipment Leak Monitoring Program.

**MACT Requirements**

This facility does not require a MACT Analysis.

**Air Quality Analysis**

This facility does not require an Air Quality Analysis.

**General Condition XVII Activities**

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

**V. PERMIT SHIELD**

This facility did not request a Permit Shield.

**VI. GLOSSARY**

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

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Hydrogen Sulfide ( $H_2S$ ) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides ( $NO_x$ ) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane ( $CH_4$ ), Ethane ( $C_2H_6$ ), Carbon Disulfide ( $CS_2$ )

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit:  $\geq 10$  tons per year of any toxic air pollutant;  $\geq 25$  tons of total toxic air pollutants; and  $\geq 100$  tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

$PM_{10}$  – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide ( $SO_2$ ) – An oxide of sulfur.

Sulfuric Acid ( $H_2SO_4$ ) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those,

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which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.



Texas Eastern Transmission, LP  
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Houston, TX 77056

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Houston, TX 77256-0542

**COPY**

original to LOA

copy to Rev. Petto/Cep 3/

Davies

**Spectra  
Energy**

February 18, 2009

*PER 20090001*

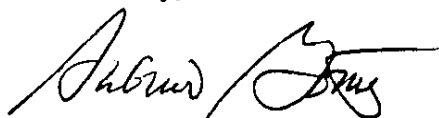
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Air Permits Division  
602 N. Fifth Street  
Baton Rouge, LA 70802  
225-219-3535

**RE: TITLE V RENEWAL APPLICATION  
TEXAS EASTERN TRANSMISSION, LP 7345  
ST. FRANCISVILLE COMPRESSOR STATION (AIN 7853)**

The original and two (2) copies of the renewal application for the St. Francisville Compressor Station are enclosed. A copy is also being sent to the Environmental Protection Agency Region 6 Office.

Contact information is included in the enclosed application if there are any questions regarding this matter.

Yours truly,



Sabino Gomez  
Principal Environmentalist

Enclosures

DEQ - OES  
2009 FEB 19 AM 10:39

c: EPA Region 6 (6PD-R), 1445 Ross Avenue, Ste. 1200, Dallas, TX 75202-2733

214-665-6444